

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

KAREN LIPPERT

JURY TRIAL DEMANDED

v.

CASE NO.

UNITED COLLECTION BUREAU, INC.

COMPLAINT

1. Plaintiff seeks relief pursuant to the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. §1692.
2. This Court has jurisdiction. 15 U.S.C. § 1692k, 28 U.S.C. § 1331.
3. Plaintiff is a natural person who at all times relevant hereto resided in Westmoreland County, Western District of Pennsylvania.
4. Plaintiff is a consumer within the FDCPA.
5. Plaintiff allegedly incurred a debt within the FDCPA.
6. Defendant holds itself out to the public as a collection agency.
7. Defendant is a debt collector within the FDCPA.
8. Defendant's collection efforts took place within the past year.
9. Defendant falsely accused Plaintiff of committing a crime.
10. Defendant told Plaintiff it turned her account over to the District Attorney.

This statement is false.

11. Defendant told Plaintiff she could go to jail. She could get picked up at work, receive a \$1,000 fine and up to two years in prison. These statements are false.
12. Defendant advised Plaintiff that it was going to transfer her account to the District Attorney's Office for prosecution. This statement is false.

FIRST COUNT

13. In the collection efforts, defendant violated the FDCPA, *inter alia*, §1692d, 1692e, 1692e(4), 1692e(5), 1692e(7), 1692e(10) and 1692f.
14. As a result of defendant's illegal collection activities, plaintiff suffered actual damages in the form of anger, anxiety, emotional distress, fear, frustration, upset, humiliation, embarrassment, as well as unjustified and abusive invasions of personal privacy.

WHEREFORE, plaintiff respectfully requests this Court to:

1. Award plaintiff such damages as are permitted by law, including actual damages and \$1,000 statutory damages; and
2. Award the plaintiff costs of suit and a reasonable attorney's fee.

JEFFREY L. SUHER, P.C.

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